

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

NO. 3:15-CR-029-N

v.

ROGER OLSON

FACTUAL RESUME

INDICTMENT: Count One: 21 U.S.C. § 841(a)(1) and (b)(1)(B)(viii)), Possession with Intent to Distribute a Controlled Substance

Count Two: 21 U.S.C. § 841(a)(1) and (b)(1)(C), Possession with Intent to Distribute a Controlled Substance

**ELEMENTS OF
THE OFFENSE:**

Count One:

In order to establish the crime of Possession with Intent to Distribute a Controlled Substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B)(viii)), as set out in Count One of the indictment, the Government must prove the following elements beyond a reasonable doubt:

- First: That the defendant knowingly or intentionally possessed a controlled substance;
- Second: That the substance possessed was in fact a mixture containing 50 grams or more of a mixture or substance containing a detectible amount of methamphetamine, a Schedule II controlled substance; and
- Third: That the defendant possessed the substance with the intent to distribute it.

Count Two:

In order to establish the crime of Possession with Intent to Distribute a Controlled Substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C), as set out in Count One of the indictment, the Government must prove the following elements beyond a reasonable doubt:

- First: That the defendant knowingly or intentionally possessed a controlled substance;
- Second: That the substance possessed was in fact a mixture containing gamma hydroxybutyric acid, a Schedule III controlled substance; and
- Third: That the defendant possessed the substance with the intent to distribute it.

STIPULATED FACTS:

On May 15, 2014, a Detective with the Garland police department, another Garland Detective assigned as a task force officer with the Drug Enforcement Agency, a Dallas Detective assigned as a task force officer with the Drug Enforcement Agency, and several other officers executed a search and seizure warrant for Roger Olson's car. On this same date, officers searched Olson's apartment and found 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine and also found a mixture containing gamma hydroxybutyric acid, a Schedule III controlled substance inside Olson's apartment.

Accordingly, Roger Olson agrees that a mixture or substance that he knowingly possessed with intent to distribute was 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine and that he knowingly possessed with the intent to distribute gamma hydroxybutyric acid, commonly known as "GHB", a controlled substance. Roger Olson also agrees that he committed each of the essential elements of counts One and Two as set out in this factual resume. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support Roger Olson's guilty plea to Counts One and Two as set forth in the indictment.

AGREED TO AND SIGNED on this 22 day of September, 2015.



ROGER OLSON

Defendant



JOSEPH MONGARAS JR.

Attorney for Defendant

Texas State Bar No. 24039975